

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of:

Telephone Number Portability

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CC Docket No. 95-116  
RM 8535

ERRATUM

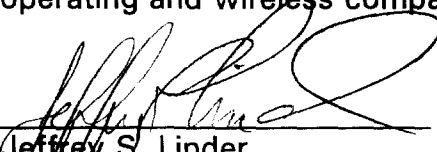
Attached herto is a corrected page for the Reply Comments of GTE Service Corporation in the above-captioned proceeding. Due to a word processing error, the original page did not include the first three lines of the Conclusion.

Respectfully submitted,

GTE SERVICE CORPORATION,  
on behalf of its affiliated domestic telephone  
operating and wireless companies

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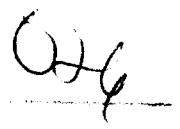
April 17, 1996

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SECRETARY

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costs will not fall evenly across all carriers or customer groups. Implementation costs per subscriber will plainly be higher in suburban and rural areas than in large cities.

To assure that long-term number portability is achieved consistently with the Act's directive of competitive neutrality, the Commission should require that all telecommunications service providers share equitably in all the associated costs. To this end, the Commission may wish to establish a cost pool, under which each subscriber is assessed a set cost amount, regardless of their carrier.<sup>18</sup> Such an approach will assure that customers do not have an incentive to either retain or change service providers to avoid portability costs. It will also motivate parties to consider all associated costs when assessing alternative trigger mechanisms, and minimize efforts to game the system by imposing the maximum possible costs on incumbent LECs.

### III. CONCLUSION

For the foregoing reasons, and those expressed in GTE's opening comments, the Commission should not mandate the use of AT&T's LRN as a triggering

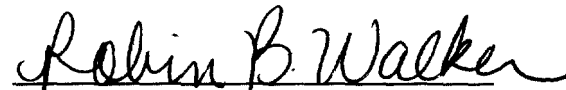
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<sup>18</sup> In this regard, GTE disagrees with those commenters who argue that LECs should not be permitted to identify number portability cost recovery charges as separate line items on customer bills. See, e.g., TCG at 5. There is no basis in the Act or policy for such a limitation, and separately identifying the charge is not anticompetitive. Indeed, the Commission and states generally have required that charges associated with particular public policy objectives be explicitly identified (e.g., the subscriber line charge and 911 surcharges).

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of April, 1996, I caused a copy of the foregoing "Erratum" to be sent via first class mail, postage prepaid to the parties named on the attached service list.

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